

The **AI Act's** **literacy obligation** in 4 questions



The (new¹) **Article 4 of the AI Act** (EU 2024/1689) requires providers and deployers of AI systems to take measures to promote AI literacy among their staff and other individuals who operate and use AI systems on their behalf. This obligation is intended to support the development of AI literacy, without creating a requirement that a specific level be achieved.

¹The Digital Omnibus on AI, which took effect on 27 July 2026, amended the original Article 4 of the AI Act. Therefore, this information sheet refers to the "new" Article 4 of the AI Act. The requirement regarding AI literacy has been simplified and is now a best-efforts obligation. In this information sheet, we explain this in more detail.

In addition to employees, organisations must also promote AI literacy among other relevant individuals, such as contractors, service providers, or customers. Furthermore, Article 4 of the AI Act applies to both public and private entities, both within and outside the European Union, whenever the AI system is placed on the European market, used in the EU, or has an impact on individuals in the Union.

AI literacy is defined in Article 3 (56) of the AI Act as:

- **skills, knowledge and understanding of AI** that allow providers, deployers and affected persons to make informed decisions about the deployment of AI systems;
- **awareness about the opportunities and risks of AI systems** and possible harm they can cause.

It is not always clear to organisations how this best-efforts obligation regarding AI literacy should be implemented in practice. The specific implementation depends on the context in which AI systems are developed, deployed or used. To support organisations

with this, **the Knowledge Centre Data & Society has prepared this information sheet to explain the AI literacy obligation in four questions.** The goal is to help organisations understand the scope of the obligation and how they can comply with it.

The **importance of AI literacy** should not be underestimated. Even when an organisation does not officially use AI systems, there may still be so-called shadow use, for example when employees take their own initiative to use applications like ChatGPT. Such use entails risks, including the unintentional sharing of confidential information or personal data with external parties. This can lead to data breaches or violations of other legal obligations, including those arising from the GDPR. In addition, the level of AI literacy may be relevant in liability matters. Although the AI Act does not in itself create criminal offences or a direct right to compensation, damages resulting from a lack of AI literacy may give rise to a liability claim under applicable national law. Insufficient knowledge of the capabilities, limitations, and risks of AI may therefore play a role in the assessment of liability.

Additional information

- [Q&A on AI literacy](#).
- [AI literacy Programs in Europe](#) – Support Article 4 of the EU Artificial Intelligence Act: Overview of AI Literacy Programs in the European Union.
- [European Digital Innovation Hubs](#): One-stop shops in Europe offering targeted services and support (including on AI).
- [Digital Skills & Jobs Platform](#): Provides open access to quality information and resources related to digital skills.
- [AI-geletterdheid in de werkcontext: bouwstenen, definities en meetkaders](#): Report drawn up by the Knowledge Centre Data & Society (only available in Dutch).
- [In 7 stappen naar AI-geletterdheid in jouw organisatie](#): Guide to AI Literacy and AI Skills, drawn up by the Knowledge Centre Data & Society (only available in Dutch).
- [AI Act Service Desk](#): Allows you to ask questions directly to the AI Office about the AI Act.

QUESTION 1



What does the EU AI literacy requirement mean?

Article 4 of the AI Act requires providers and deployers of AI systems to take measures to promote AI literacy among their staff and other persons who use or operate AI systems on their behalf. Providers are individuals or organisations that develop (or have developed) a general-purpose AI system or model and place it on the market or put it into service themselves. Deployers are those who use an AI system under their own authority for a professional activity.

Unlike most obligations under the AI Act, the AI literacy requirement is not linked to the risk level of the AI system in question. It applies to all providers and deployers of AI systems, regardless of the classification or risk category of the AI system or model.

The obligation regarding AI literacy does not rest exclusively with organisations. The European Commission and the Member States must support the efforts of providers and deployers. For example, the Commission will publish practical examples via the '[Single Information Platform](#)', while the AI Board will develop recommendations based on the European competence frameworks.

QUESTION 2



How can organisations meet the EU's AI literacy requirement?

There is no one-size-fits-all approach to AI literacy. However, there are some minimum requirements. Providers and deployers of AI systems must:

1. ensure a general understanding of AI within their organisation;
2. consider the role of the organisation (provider and/or deployer); and
3. raise awareness about the risks of the AI systems provided or deployed and how to mitigate them.

To develop training programmes in accordance with Article 4 of the AI Act, an organisation must consider the technical knowledge, experience, education, and background of its staff, as well as the context of use, the purpose of the AI system, and the individuals affected by it. In this regard, it is generally not sufficient to rely solely on

asking employees to read user manuals. This obligation requires that training and guidance be tailored to the specific characteristics of the target groups involved and the actual use of AI systems within the organisation.

The AI Office offers a 'living repository' on AI literacy to share examples of best practices that can serve as inspiration. However, adopting these practices does not automatically mean compliance with Article 4 of the AI Act. Finally, the tool '[In 7 stappen naar AI-geletterdheid in jouw organisatie.](#)' can also help organisations get started on AI literacy (only available in Dutch).

QUESTION 3



Who monitors compliance with the EU's AI literacy requirement?

Although Article 4 of the AI Act has been in force since 2 February 2025, its enforcement has been postponed to a later date. By 2 August 2025, Member States were required to designate at least one national market surveillance authority that will be empowered as of 2 August 2026 to monitor compliance with the AI literacy requirement and, if necessary, impose sanctions.

In Belgium, work is still underway on a legal framework that will establish the competent authorities, including the BIPT (Belgian Institute for Postal Services and Telecommunications) as the central authority, and the applicable sanctions regime. In addition, a cooperation agreement is being prepared to set out the division of

competences and cooperation between federal and regional authorities. As a result, there is currently no clarity regarding how exactly Article 4 of the AI Act will be enforced.

In principle, the enforcement of Article 4 of the AI Act falls under the jurisdiction of the national market surveillance authorities. However, the European AI Office, in collaboration with the European AI Board, supports the consistent implementation of the AI Act across Member States. The general coordination of the implementation of the AI Act in Belgium is carried out by the FPS Economy.



What are the penalties for non-compliance with the EU's AI literacy requirement?

Penalties for non-compliance with Article 4 of the AI Act are determined by national legislation. They must be proportionate, based on the individual case, and take into account the nature and severity of the violation, as well as whether it was intentional or negligent. Although it is not mandatory to document all internal AI literacy training sessions, organisations are advised to do so for legal purposes. This makes it easier for them to demonstrate what efforts they have made in the event that, for example, an AI incident occurs and a lack of AI literacy turns out to be a possible cause.

As mentioned earlier, work is still underway in Belgium on the national enforcement and sanctions framework for the AI Act. Consequently, there is currently no clarity regarding the specific sanctions that may be imposed for a violation of Article 4 of the AI Act. Furthermore, the obligation regarding AI literacy was weakened to a best-efforts obligation under the approved Digital Omnibus on AI. As a result, it seems less likely that a mere non-compliance with Article 4 of the AI Act will automatically lead to direct sanctions. The underlying reason is that AI literacy is an essential prerequisite for the safe, responsible, and effective use of AI systems.

The focus is therefore more on supporting and guiding organisations and users in developing the necessary competencies than on penalising shortcomings.

Setting aside the debate over sanctions, the requirement for AI literacy offers clear added value. It promotes awareness of the opportunities and risks associated with AI systems, helping to prevent or mitigate harm.

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